

DMP:AAS/LZ/ADR  
F. #2021R00608

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

DOMAGOJ PATKOVIC,  
also known as "Mislav,"  
"madsin1488,"  
"Abrahamavich" and  
"Timothy,"

Defendant.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy To Transmit Threatening Communications)

1. In or about and between May 2021 and September 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DOMAGOJ PATKOVIC, also known as "Mislav," "madsin1488," "Abrahamavich" and "Timothy," together with others, did knowingly and willfully conspire to transmit in interstate and foreign commerce one or more communications, to wit: telephone and Voice-over-Internet-Protocol ("VoIP") calls streamed over an Internet-based electronic communications service ("ECS-1"),<sup>1</sup> containing one or more threats to injure the person of another, contrary to Title 18, United States Code, Section 875(c).

Filed Under Seal  
File Date: August 5, 2024  
Case Number: 24-cr-317  
Judge Ramon E. Reyes, Jr  
Magistrate Judge Sanket J. Bulsara

I N D I C T M E N T

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 371, 844(c)(1), 844(e),  
844(n), 875(c), 981(a)(1)(C), 982(a)(2),  
982(b)(1), 1038(a)(1), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

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<sup>1</sup> The identities of each of the entities anonymized in this Indictment are known to the Grand Jury.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant DOMAGOJ PATKOVIC, also known as “Mislav,” “madsin1488,” “Abrahimavich” and “Timothy,” together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about May 18, 2021, PATKOVIC made violent threats on a call to Victim-1, a Jewish hospital located in Queens, New York. During the call, PATKOVIC stated that he planted bombs around the hospital and wanted to “kill all k\*\*\*s.”

(b) On or about May 18, 2021, PATKOVIC made violent threats on a call to Victim-2, a Jewish care center network with locations in Manhattan, Brooklyn and Queens, New York. During the call, PATKOVIC stated that “bombs are all over your facility and all those k\*\*\*s are gonna go skyrocket up into the sky for Allah.”

(c) On or about May 24, 2021, PATKOVIC made violent threats on a call to Victim-1. During the call, PATKOVIC stated that he planted bombs around the hospital and further stated, “I’m gonna kill you k\*\*\*s.”

(d) On or about September 15, 2021, PATKOVIC made violent threats on a call to Victim-3, a Jewish hospital located in Queens, New York. During the call, PATKOVIC stated that he placed backpacks containing C-4 explosives around the hospital building.

(e) On or about September 15, 2021, PATKOVIC made violent threats on a call to Victim-4, a Jewish hospital located in Nassau County, New York. During the call, PATKOVIC identified himself as “Abrahimavich” and stated that he had placed “C-4 in

maintenance closets” at the hospital. PATKOVIC further stated, “I’m gonna blow you to bits you f\*\*\*ing k\*\*\* b\*\*\*h.”

(f) On or about September 15, 2021, PATKOVIC made violent threats against Victim-4 on a call to personnel at a 911 dispatch center in Nassau County, New York. During the call, PATKOVIC identified himself as “Abrahimavich” and stated that “I just called the hospital requesting my f\*\*\*ing million dollars or I’m gonna blow this k\*\*\* f\*\*\*ing b\*\*\*h to the sky.” PATKOVIC provided the address of Victim-4.

(g) On or about September 17, 2021, PATKOVIC made violent threats on a call to Victim-2. During the call, PATKOVIC identified himself as “Timothy,” stated that he worked in housekeeping, and stated that he had placed “15 backpacks full of C-4 with cellphones strapped to them in all of your maintenance closets.” PATKOVIC further stated, “I’m gonna blow you k\*\*\*s sky high.”

(Title 18, United States Code, Sections 371 and 3551 et seq.)

#### COUNT TWO

(Conspiracy To Maliciously Convey False Information Concerning Explosives)

3. In or about and between May 2021 and September 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DOMAGOJ PATKOVIC, also known as “Mislav,” “madsin1488,” “Abrahimavich” and “Timothy,” together with others, through the use of a telephone, and other instrument of interstate and foreign commerce, to wit: the Internet, did knowingly and intentionally conspire to make one or more threats and maliciously convey false information knowing the same to be false, concerning an alleged attempt to kill, injure and intimidate one or more individuals and unlawfully to damage and destroy one or more buildings and other real and personal property by

means of an explosive, to wit: Victim-1, Victim-2, Victim-3 and Victim-4, contrary to Title 18, United States Code, Section 844(e).

(Title 18, United States Code, Sections 844(n) and 3551 et seq.)

**COUNTS THREE THROUGH NINE**  
(Transmission of Threatening Communications)

4. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant DOMAGOJ PATKOVIC, also known as “Mislav,” “madsin1488,” “Abrahamavich” and “Timothy,” together with others, did knowingly and willfully transmit in interstate and foreign commerce one or more communications, to wit: telephone and VoIP calls streamed over ECS-1, containing one or more threats to injure the person of another:

COUNT	APPROXIMATE DATE	VICTIM
THREE	May 18, 2021	Victim-1
FOUR	May 18, 2021	Victim-2
FIVE	May 24, 2021	Victim-1
SIX	September 15, 2021	Victim-3
SEVEN	September 15, 2021	Victim-4
EIGHT	September 15, 2021	Victim-4
NINE	September 17, 2021	Victim-2

(Title 18, United States Code, Sections 875(c), 2 and 3551 et seq.)

**COUNTS TEN THROUGH SIXTEEN**  
(Making Threats and Maliciously Conveying False Information Concerning Explosives)

5. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant DOMAGOJ PATKOVIC, also known as “Mislav,”

“madsin1488,” “Abrahamavich” and “Timothy,” together with others, through the use of a telephone and other instrument of interstate and foreign commerce, to wit: the Internet, did knowingly and willfully make one or more threats and maliciously convey false information knowing the same to be false, concerning alleged attempts to kill, injure and intimidate one or more individuals, and unlawfully to damage and destroy one or more buildings and other real and personal property by means of an explosive, to wit: Victim-1, Victim-2, Victim-3 and Victim-4, as described below:

COUNT	APPROXIMATE DATE	VICTIM
TEN	May 18, 2021	Victim-1
ELEVEN	May 18, 2021	Victim-2
TWELVE	May 24, 2021	Victim-1
THIRTEEN	September 15, 2021	Victim-3
FOURTEEN	September 15, 2021	Victim-4
FIFTEEN	September 15, 2021	Victim-4
SIXTEEN	September 17, 2021	Victim-2

(Title 18, United States Code, Sections 844(e), 2 and 3551 et seq.)

**COUNTS SEVENTEEN THROUGH TWENTY-THREE**  
(False Information and Hoaxes)

6. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant DOMAGOJ PATKOVIC, also known as “Mislav,” “madsin1488,” “Abrahamavich” and “Timothy,” together with others, did knowingly and intentionally engage in conduct with intent to convey false and misleading information under circumstances where such information may reasonably have been believed and where such information indicated that an activity had taken, was taking and would take place that would

constitute a violation of Chapter 113B of Title 18 of the United States Code, to wit: Title 18, United States Code, Section 2332a(a)(2) (use of weapons of mass destruction), in that the defendant stated that explosives had been placed at the premises of Victim-1, Victim-2, Victim-3 and Victim-4, as described below, when in fact, as he then and there well knew and believed, they had not:

COUNT	APPROXIMATE DATE	VICTIM
SEVENTEEN	May 18, 2021	Victim-1
EIGHTEEN	May 18, 2021	Victim-2
NINETEEN	May 24, 2021	Victim-1
TWENTY	September 15, 2021	Victim-3
TWENTY-ONE	September 15, 2021	Victim-4
TWENTY-TWO	September 15, 2021	Victim-4
TWENTY-THREE	September 17, 2021	Victim-2

(Title 18, United States Code, Sections 1038(a)(1), 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT ONE AND COUNTS THREE THROUGH NINE**

7. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Count One, or in Counts Three through Nine, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

**CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT TWO AND COUNTS TEN THROUGH SIXTEEN**

9. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Count Two, or in Counts Ten through Sixteen, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 844(c)(1), which requires any person convicted of such offenses to forfeit any explosive materials involved or used or intended to be used in any violation of Title 18, United States Code, Section 844; and (b) Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offenses.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 844(c)(1), 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL

s/

FOREPERSON

*By Carolyn Pokorny, Assistant US Attorney*

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK